

Document 0001



SOUTHWEST CENTER FOR ENVIRONMENTAL RESEARCH & POLICY

June 11, 2004

Dr. Ellen Russell
NEPA Document Manager
Office of Fossil Energy
U. S. Department of Energy
Washington, D.C. 20585

Re: DOE/EIS-0365

Dr. Russell,

As a binational consortium of universities that has studied border and binational energy issues closely for over five years, we appreciate the opportunity to comment on the Draft EIS for the transboundary power lines in California and Baja California.

We have read the health impact assessment and are discouraged to find that populations in Mexico are not considered in the analysis. By only considering US populations located miles away the assessment ignores and implies a callousness about the health consequences to the much larger and much closer populations that are most at risk. We endorse and promote the concept of a politically-neutral common airbasin when and where meteorology and topography clearly define that the same air is breathed by citizens of different jurisdictions.

Like other organizations, we are extraordinarily sensitive to sovereignty issues but believe the spirit of cooperation and collaboration is forwarded by considerations of needs and impacts to neighboring jurisdictions. Both the United States and Mexico have standards for emissions and ambient air quality as well as the means to enforce them. While the actual standards and mechanisms may be slightly different, the concern for public health is paramount.

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Transboundary Environmental Impact Assessments (TEIAs) offer the opportunity to understand, minimize, monitor, and mitigate impacts across international boundaries. The failure of DoE to scope these important components of the overall analysis reflects a disregard for the significance of international relations, health, and overall energy security. The California Resources Agency is setting an excellent TEIA example by considering all impacts to Mexico in the restoration of the Salton Sea. In addition, the trinational Commission for Environmental Cooperation has had, as a collateral mission, since the passage of NAFTA over ten years ago, the task of facilitating such studies and deliberations. The federal government can promote good will by engaging in such transboundary studies.

We urge DoE and its consultants to recalculate the health risk assessment with consideration of populations in Mexico. We believe Mexican environmental impact assessments are available and should be consulted. In doing so, the DoE will not only improve conditions for Mexican populations along their northern border, but will strengthen relationships to improve environmental health and quality for U.S. communities along the border with Mexico.

D. Rick Van Schoik, Managing Director
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P: WORDDOC ENGINEER Draft Environmental Impact Statement - Mexico to LV, Inc. • Construction Employer

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The paragraph states an "average" concentration of selenium of 21 micrograms per liter. The USGS suggests that a statement be added to indicate that the average value is based on detection values only. One common approach for describing the variability of water-quality data having censored values (detection and non-detection) is to present all the data in terms of percentiles. In this manner, the variability of the entire data set for the period of record is addressed.

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Thank you for the opportunity to review and comment on this DEIS.

REFERENCE:

Linsley, RK, Kohler, MA, and Paulhus, JL, 1975, Hydrology for Engineers, McGraw-Hill, New York, 482 p.

Copy to: Office of Environmental Policy and Compliance

Document 0004



July 12, 2004

Mrs. Ellen Russell
Fossil Energy, FE-27
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1000 Independence Avenue, SW
Washington, DC 20585-0350

Subject: Border Power Plant Working Group (BPPWG) Comments on Draft Environmental Impact Statement for InterGen's La Rosita Power Complex (LRPC) and Semptra's Termoelectrica de Mexicali (TDM) Transmission Lines

Dear Ellen:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the LRPC and TDM transmission lines. The Border Power Plant Working Group (BPPWG) comments on the DEIS are enclosed. BPPWG comments are provided in the order the issues being commented upon are presented in the DEIS. I will present a summary of these comments at the public hearing that the Department of Energy will convene in Calexico on July 14, 2004. Please contact me at (619) 295-2072 if you have any questions about the enclosed comments.

Sincerely,

Bill Powers, P.E.

Bill Powers, P.E.
Chair, Border Power Plant Working Group

cc: U.S. Senator Diane Feinstein
U.S. Senator Barbara Boxer
Congressman Bob Filner
State Senator Denise Ducheny
State Assemblyman Juan Vargas
Imperial County Supervisor Joe Maruca
Imperial County APCD Director Steve Birdsall
California Air Resources Board
California Environmental Protection Agency
Colorado River Basin Regional Water Quality Control

Salton Sea Authority
New River Wetlands Project
Environmental Defense
Sierra Club
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Border Ecology Project
Sky Island Alliance
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